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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

SATEKI LAO, PATSY LAO,  
and SIONE PUTUTAU,

Defendants.

COMPLAINT

COUNT I: Conspiracy (18 U.S.C. § 371)

COUNT II: Theft of Firearms From  
Licensed Dealer (18 U.S.C. § 924(m))

Magistrate Judge Jared C. Bennett

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Before the Honorable Jared C. Bennett, United States Magistrate Judge for the  
District of Utah, appears the undersigned, who on oath deposes and says:

**Count 1**  
**18 U.S.C. § 371**  
**(Conspiracy)**

On or about November 1, 2020, in the District of Utah,

**SATEKI LAO, PATSY LAO, and SIONE PUTUTAU,**

defendants herein, knowingly and intentionally combined, conspired, confederated,  
agreed, and had a tacit understanding with each other, to violate 18 U.S.C. § 924(m)

(Theft of Firearms from a Licensed Dealer) in connection with the theft of the following firearms:

- Beretta, model 8000 Cougar F, 9mm handgun, SN 003140MC
- Beretta, model 8000 Cougar F, 9mm handgun, SN 003318MC
- Rock Island Armory, model 1903, 30-06 rifle, SN 267783
- Smith & Wesson, model 41, 22LR handgun, SN 43598
- Beretta, model 92FS, 9mm handgun, SN A030199Z
- Ruger, LCP II, 380 ACP handgun, SN 380516816
- Remington, model 700, .223 rifle, C6531783
- North American Arms, model Mini, 22 mag revolver, SN E421507
- North American Arms, model 22LR, 22LR handgun, SN L225661
- Springfield Armory, model XD-9, 9mm handgun, SN XD871655
- Springfield Armory, model Hellcat, 9mm handgun, SN BY382104
- Remington, model R51, 9mm handgun, SN H009699R51
- Springfield Armory, model XDM, 9mm handgun, SN MG425978
- Smith & Wesson, model M&P9 Shield EZ, 9mm handgun, SN RJC4398
- Walther, model PPK/S, 22LR handgun, WF056916
- Glock, model 43, 9mm handgun, SN AEXU555;

from Bountiful Armory, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, and in furtherance of the conspiracy, broke into Bountiful Armory and carried away the above-listed firearms; all in violation of 18 U.S.C. § 371.

**Count 2**  
**18 U.S.C. § 924(m)**  
**(Theft of Firearms from a Licensed Dealer)**

On or about November 1, 2020, in the District of Utah,

**SATEKI LAO, PATSY LAO, and SIONE PUTUTAU,**

defendants herein, knowingly broke into Bountiful Armory, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, and carried away the following firearms:

- Beretta, model 8000 Cougar F, 9mm handgun, SN 003140MC
- Beretta, model 8000 Cougar F, 9mm handgun, SN 003318MC
- Rock Island Armory, model 1903, 30-06 rifle, SN 267783
- Smith & Wesson, model 41, 22LR handgun, SN 43598
- Beretta, model 92FS, 9mm handgun, SN A030199Z
- Ruger, LCP II, 380 ACP handgun, SN 380516816
- Remington, model 700, .223 rifle, C6531783
- North American Arms, model Mini, 22 mag revolver, SN E421507
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- Springfield Armory, model Hellcat, 9mm handgun, SN BY382104
- Remington, model R51, 9mm handgun, SN H009699R51
- Springfield Armory, model XDM, 9mm handgun, SN MG425978
- Smith & Wesson, model M&P9 Shield EZ, 9mm handgun, SN RJC4398
- Walther, model PPK/S, 22LR handgun, WF056916
- Glock, model 43, 9mm handgun, SN AEXU555;

with the intent to permanently deprive Bountiful Armory of those firearms; all in violation of 18 U.S.C. § 924(m).

This complaint is made on the basis of investigation consisting of the following:

### **Agent Background**

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since December 12, 2016. I am assigned to the Salt Lake City Field Office, in the District of Utah. I have completed the twelve (12) week Criminal Investigator Training Program and the fourteen (14) week Special Agent Basic Training course at the Federal Law Enforcement Training Center in Glynco, Georgia. These courses consisted of instruction in federal law, evidence handling, interviewing techniques, firearms investigations, explosive investigations, arson investigations and tactical training in the execution of search and arrest warrants. Prior to being an ATF Special Agent I was

an Explosive Ordnance Disposal Technician with the United States Air Force for approximately eight (8) years, and am currently training as an ATF Certified Explosive Specialist. As a special agent I have investigated violent crimes involving firearms, explosives, arsons, gang violence, and drug trafficking.

### **Statement of Probable Cause**

2. On November 1, 2020, at approximately 5:05 am, Bountiful Police Department officers were dispatched to Bountiful Armory at 144 West 500 South, Bountiful, UT, due to a security alarm breach. Bountiful Armory is a Federal Firearms Licensee (FFL) that legally deals and transfers firearms. Upon arrival, officers saw the rear door of Bountiful Armory pried open. After entering the FFL, officers observed a destroyed display case. Officers then conducted an area canvas attempting to locate any suspects unsuccessfully.

3. The owner and operator of Bountiful Armory arrived at the FFL and downloaded internal security camera footage for law enforcement to investigate. The security camera footage showed two males arrive at approximately 4:35 am on November 1, 2020. Utilizing a metal bar and various other materials found in the general area, these two individuals breached the secure metal rear door after approximately 20 minutes of effort. The two individuals then entered the FFL with one back pack, one shoulder bag, and the metal bar used to pry open the door.

4. Once inside the FFL, the individuals used the metal bar to break open a display case containing multiple handguns. The individuals then removed fourteen (14) handguns and placed them into the two bags they brought in with them. Immediately after closing the

bags with the handguns inside, the individuals grabbed two (2) long guns sitting on a rifle rack on their way back out the rear door. The individuals left on foot in an easterly direction until outside of security camera view. After an internal inspection it was found a total of sixteen (16) firearms were stolen from Bountiful Armory, fourteen (14) handguns and two (2) long guns.

5. Security camera footage from a nearby laundromat facility showed what appeared to be a black sport utility vehicle with custom wheels drop off an individual who matches one of the individuals Bountiful Armory's surveillance captured within a few minutes of the burglary.

6. Your affiant distributed still shot images taken from the security camera footage at Bountiful Armory and the laundromat to Salt Lake City Police Department (SLCPD) Gang Unit Detectives due to their extensive knowledge of criminal behavior in the Salt Lake Valley and surrounding areas. Based on the security camera footage still images, SLCPD Gang Detectives recognized the vehicle, a 2008 black Ford Expedition bearing license plate V035ZE with custom wheels, due to numerous vehicle stops where PATSY LAO was the driver.

7. Security camera footage from the Maverik gas station located at 105 South 200 West, Bountiful, UT approximately three blocks from the Bountiful Armory, showed two females arrive in the parking lot driving the same black Ford Expedition at approximately 4:45 am on November 1, 2020. One female donning purple highlights in her hair matching the description of PATSY LAO was seen entering the Maverik gas station with another

female donning pink hair. The two then left the Maverik at approximately 4:49 am headed back in the direction of Bountiful Armory.

8. On November 5, 2020, at approximately 1:00 am, Salt Lake City Police Department (SLCPD) Gang Unit Detectives observed the suspect Ford Expedition in Salt Lake City. Mobile surveillance was established until the vehicle pulled into the driveway of 910 West 600 South, Salt Lake City, UT. A traffic stop was conducted and detectives observed SATEKI LAO as the passenger of the vehicle. SATEKI LAO had an active protective order from his wife PATSY LAO, who was the driver of the vehicle.

9. On SATEKI PAO's person, detectives found one (1) Springfield Armory, Model XDM-9, 9mm handgun, bearing serial number MG425978. Inside PATSY LAO's purse, detectives located one (1) North American Arms, 22LR revolver, bearing serial number L225661, and one (1) Glock, Model 43, 9mm handgun, bearing serial number AEXU555. All three firearms located matched firearms stolen on November 1, 2020, from Bountiful Armory.

10. SATEKI LAO and PATSY LAO stated they recently moved to the address where the stop was made at 910 West 600 South, Salt Lake City, UT. Due to the connection with the burglary and the now thirteen (13) out of original sixteen (16) stolen firearms still outstanding, SLCPD detectives authored and were granted a search warrant for the residence in search of those firearms or other items of evidentiary value connecting SATEKI LAO and PATSY LAO to the Bountiful Armory burglary.

11. Inside the residence, detectives encountered SIONE PUTUTAU, who matched the

description of the second male individual seen on security camera footage conducting the Bountiful Armory burglary. PUTUTAU had an active ATF warrant for two other FFL burglaries. PUTUTAU was placed under arrest for his active federal warrant and connection to this burglary.

12. During the execution of the search warrant, detectives located two pairs of shoes matching those being worn by the two males in the surveillance video. One pair of shoes was a Nike running shoe with a distinct pattern around the tongue that reflected the light of the infrared cameras at Bountiful Armory. The other shoes located at the residence were a pair of tan Timberland boots that were observed in the surveillance of the burglary. Detectives also located a plain gray sweatshirt with no markings and reinforced stitching around the shoulder. This sweatshirt is observed on one of the males during the burglary. Detectives found the original manufacturer firearm case for the Springfield Armory XDM-9 found on SATEKI LAO labeled with the matching serial number.

13. PATSY LAO was advised of her Miranda Rights and signed a Miranda Waiver stating she was willing to speak with law enforcement without an attorney present. PATSY LAO stated she was in Bountiful during that time, dropped off SATEKI LAO and PUTUTAU, then went to the Maverik as seen on the surveillance camera footage. PATSY LAO stated she then left the Maverik and drove to a parking lot predetermined by SATEKI LAO and waited for LAO and PUTUTAU to return. PATSY LAO denied knowing the two were burglarizing the Bountiful Armory, and that the firearms found on her person were given to her by SATEKI LAO.

Based on the foregoing information, your affiant respectfully requests that a warrant of arrest be issued for SATEKI LAO, PATSY LAO, and SIONE PUTUTAU for violations of 18 U.S.C. §§ 371 and 924(m).

 Aaron Grubbs  
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Affiant,  
Special Agent Aaron Grubbs

SUBSCRIBED AND SWORN to before me this 6TH day of November 2020.

  
JARED C. BENNETT  
United States Magistrate Judge

APPROVED:

JOHN W. HUBER  
United States Attorney

JAMIE  
THOMAS

Digitally signed by  
JAMIE THOMAS  
Date: 2020.11.06  
14:35:19 -07'00'

Jamie Z. Thomas  
Assistant United States Attorney